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October 15, 2018

Via ECF

The Honorable Gabriel W. Gorenstein
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Choi et al. v. Tower et al.*, No. 14-cv-9912-KMW (S.D.N.Y.)

Dear Judge Gorenstein:

We write pursuant to Rules 1E. (Requests for Extensions of Deadlines) and 2.B. (Briefing Schedule on Motions) of Your Honor's Individual Practices. During a hearing held on October 2, 2018, Plaintiffs requested two weeks to file a motion for leave to amend the operative complaint, which would make the deadline tomorrow, October 16. Your Honor also directed Plaintiffs and Defendants to consult Your Honor's Individual Practices to determine a briefing schedule on that motion.

Plaintiffs write under Rule 1.E. to request that the deadline to file the motion and proposed amended complaint be extended from tomorrow, October 16, to Friday, October 19. Plaintiffs have not previously requested an extension and do so now to ensure that the proposed amended complaint, and the accompanying motion papers and brief, are adequately prepared. Defendants do not object to this extension.

Plaintiffs also write under Rule 2.B. to inform Your Honor that the parties have agreed that Defendants' opposition will be filed November 16, 2018, and that Plaintiffs' reply will be

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filed December 6, 2018.¹

Respectfully submitted,

/s/ Michael Eisenkraft
Michael Eisenkraft

Cc: Counsel of Record (via ECF)

¹ The parties are still conferring regarding a schedule for producing and reviewing Defendants' source code in advance of the anticipated expert hearing, and will submit that schedule, as well as a proposed extension of the overall discovery schedule, in the coming weeks.